Case 2:25-mj-30062-DUTY ECF No. 1 Page D 1 Filed 02/11/25 Page 1 of 7 Page 100 Page 1 of 7 Page 100 Pa

AO 91 (Rev. 11/11) Criminal Complaint Special Agent: Jessica Salley Telephone: (313) 202-3500

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

		1110111184111			
United States of America v.					
Fredrick WINDMON, Jr.		Case No.	Case: 2:25-mj-30062 Assigned To: Unassigned Assign. Date: 2/11/2025 Description: CMP SEALED MATTER (DA)		
	CRIMINAL COMP	LAINT			
I, the complainant in this case, sta	ate that the following is tru	e to the best	of my knowled	ge and belief.	
On or about the date(s) of	November 7, 2024	in the	e county of	Lenawee	in the
Eastern District of Mic	chigan, the defendan	t(s) violated	:		
Code Section Offense Description					
18 U.S.C. 922(g)(1)	Felon in possession of a firearm				
21 U.S.C. 841(a)(1)	Possession and dis	ribution of co	ontrolled substan	ces	
This criminal complaint is based of	on these facts:				
✓ Continued on the attached sheet.	Spec	eial Agent Jes	Complainant's	F	8
Sworn to before me and signed in my presence and/or by reliable electronic means.		Cn -	Printed name		9

Honorable Elizabeth Stafford, U.S. Magistrate Judge

Printed name and title

February 11, 2025

City and state: Detroit, Michigan

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jessica Salley, a Special Agent with the Bureau of Alcohol,

Tobacco, Firearms and Explosives (ATF), being first duly sworn, hereby
depose and state as follows:

Introduction and Agent Background

- 1. I have been a Special Agent with ATF since February 2005. I am currently assigned to the ATF Ann Arbor Field Office.
- 2. I have a bachelor's and master's degree in criminal justice.

 To become an ATF Special Agent, I completed the Criminal Investigator

 Training Program course at the Federal Law Enforcement Training

 Center, and the ATF Special Agent Basic Training Course.
- 3. Throughout my law enforcement career, I have participated in numerous state and federal investigations. During my employment with the ATF, I have investigated criminal violations relating to firearms, firearms trafficking, violent crime, criminal street gangs, narcotics, and explosives. I have participated in all aspects of criminal investigations, including, but not limited to, interviews, physical surveillance, and the execution of search and arrest warrants. I have

personally investigated and/or assisted other agents and officers in their investigations of federal firearm investigations.

4. I make this affidavit from personal knowledge based on my participation in this investigation, as well as communications with others who have personal knowledge of the events and circumstances described herein, and my review of reports by myself and/or other law enforcement agents, as well as information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

Probable Cause

5. The United States, including the ATF, is currently investigating Fredrick WINDMON JR. (B/M, DOB: XX/XX/XX99), a convicted felon, for knowingly possessing a Smith and Wesson, model 5906, 9mm pistol, said firearm having previously travelled in and affected interstate commerce in violation of 18 U.S.C. § 922(g)(1) (being a felon in possession of a firearm) and distributing narcotics in violation of 21 U.S.C. § 841(a)(1).

- 6. I reviewed a criminal history check for WINDMON JR. This check revealed WINDMON JR. was convicted of unarmed robbery in Jackson County in 2016 and also for delivery/manufacture of controlled substance (cocaine), possession of a controlled substance, and being a felon in possession of a firearm in Isabella County, in 2022.
- 7. Because WINDMON has been convicted of two felony offenses and served more than a year in prison for these convictions, there is probable cause to believe that WINDMON is aware of his status as a convicted felon.
- 8. In October 2024, members of the Michigan Department of State Police, RHINO unit (Region of Irish Hills Narcotics Office) identified Individual A¹ as selling narcotics in Hillsdale and Jackson counties.
- 9. On October 3, 2024, RHINO undercover (UC) officers agreed to meet Individual A in Jackson to purchase heroin and methamphetamine. When the UC officers arrived, they saw Individual A standing with a man later identified as Fredrick WINDMON JR.

¹ Individual A's identity is known to law enforcement, but does not appear in this publicly filed document.

Individual A and WINDMON JR. walked to the UC vehicle, and Individual A entered the vehicle while WINDMON JR. stood outside the vehicle. Individual A advised that she did not have the narcotics, but that WINDMON JR. had them.

- 10. Individual A then exited the UC vehicle and WINDMON JR. entered. Windmon Jr. removed a medium-size bag of suspected heroin and a medium-size bag of suspected methamphetamine. The UCs then gave WINDMON JR. the pre-recorded buy money.
- 11. A forensic laboratory analysis revealed one of the bags to contain methamphetamine and the other bag to contain a mixture of heroin and fentanyl.
- 12. During the conversation in the car, WINDMON JR. said he had recently been released from prison. Detectives identified WINDMON JR. from the Michigan Offender Tracking Information System. A Michigan secretary of state photo also confirmed his identity.
- 13. On November 7, 2024, RHINO UC officers contacted WINDMON JR. and ordered four ounces of methamphetamine and a firearm. WINDMON JR. advised that \$1,600 would cover the firearm and methamphetamine and arranged to meet in Hudson, which is in

Lenawee County. WINDMON JR. arrived as the passenger in a blue Buick Verano. One of the UC officers exited the UC vehicle and went to the trunk of the Buick Verano in which WINDMON JR. had arrived. WINDMON JR. pointed to a pistol in the trunk of the vehicle.

- 14. The UC officer retrieved the firearm, a Smith and Wesson, model 5906, 9-millimeter pistol, and took it back to the UC vehicle. WINDMON JR. then removed two medium-size bags containing a clear crystal-like substance and provided them to the UC. The UC officer gave WINDMON JR. \$1,600 in pre-recorded buy funds. The two UC officers then drove away. A laboratory analysis confirmed that the bags contained methamphetamine.
- 15. I consulted with Special Agent Mark Davis, an interstate nexus expert with my agency. After receiving a description of the recovered firearm, Agent Davis determined this firearm was not manufactured in the state of Michigan and therefore previously traveled in and affected interstate or foreign commerce.

CONCLUSION

16. Probable cause exists that on November 7, 2024, in the

Eastern District of Michigan, Fredrick WINDMON JR., a convicted

felon, knowingly possessed, in and affecting interstate commerce, a

firearm, in violation of 18 U.S.C. § 922(g)(1) and on October 3, 2024, and

November 7, 2024, distributed narcotics, in violation of 21 U.S.C. §

841(a)(1).

Respectfully Submitted,

Jessica Salley, Special Agent Bureau of Alcohol, Tobacco,

Firearms and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means.

Hon. Elizabeth Stafford

United States Magistrate Judge

Dated: February 11, 2025